

Name

Andra Rush,

an individual

Address

34 Carlitos Way, St Augustine, FL 32092

Telephone

VideoPhone # 727-537-9924

FILED
2023 MAY 22
CLERK
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

The Wizard Trades, LLC and Michael Hubbs

Plaintiff,

vs.

Charlton LaChase - an individual,
Andra Rush - an individual,
Steven Duhon - an individual,
Brian Hertneky - an individual

Defendant(s).

MOTION to/for: request for a 30 days time extension to obtain a legal counsel.

Case No: 2:23-cv-00207-DAO

Judge: Daphane A. Oberg

I, Andra Rush, representing myself without a

lawyer, move to/for request for a good cause of time extension to obtain an counsel to represent me on this matter.

under the following statute(s)/rule(s) (if known) Utah R. Civ. P. 6 (b) (1) (A) for the

following reason(s): I was served with the lawsuit by an officer on May 4th, 2023 at my old home while I was in

the middle of moving process at my old Clearwater, FL home to St Augustine, Florida from on May 12, 2023 which didn't

give me the time to obtain a counsel in this short time frame. I pray to request the Court to update my address to

34 Carlitos Way, St Augustine, FL 32092. I also pray to request the Honorable Court Judge to grant me 30 days time

extension to obtain a counsel that will represent me on this case matter per se Rule 6 (b) (1) (A). Please and Thank You.

Lease verficiation documents can be provided per request. I have never requested for a time extension before as this is the first time.

The deadline for this response is 21 days after being served with the lawsuit hence the date is Thursday May 25th 2023.

DATED: May 22, 2023.

Andra Rush
Signature

CERTIFICATE OF SERVICE

I certify that on 5/22/23 a copy of the above motion was served, by first class U.S. mail, fax, email, or hand-delivery, to
at Randall Bateman
Bateman IP
(Opposing party or counsel)

299 S. Main St
(Address).
Suite 1300
Salt Lake City, Utah 84111

Dated: 5/22/23

Andra Rush
Signature

CERTIFICATE OF SERVICE

I certify that on 5/22/23 a copy of the above motion was served, by first class U.S. mail, fax, email, or hand-delivery, to
at

(Opposing party or counsel)

Charlton LaChase
7006 Citrus Park Blvd
Ft Pierce, FL 34951
chelachance2700@gmail.com

Dated: 5/22/23

Andra Rush

Signature

CERTIFICATE OF SERVICE

I certify that on 5/22/23 a copy of the above motion was served, by first class U.S. mail, fax, email, or hand-delivery, to
at

(Opposing party or counsel)

Steven Duhon
3801 W Spring Creek Pkwy
Apt 2122
Plano TX 75023

Dated: 5/22/23

Andra Rush

Signature

331.255.7513

CERTIFICATE OF SERVICE

I certify that on 5/22/23 a copy of the above motion was served, by first class U.S. mail, fax, email, or hand-delivery, to
at

(Opposing party or counsel)

Brian Hertneky
108 Ontemford Dr
Aurora, OH 44202
-hertneky30@gmail.com

Dated: 5/22/23

Andra Rush

Signature

412.259.0499